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Counsel to Ad Hoc Group of Equity Interest Holders

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
VOYAGER DIGITAL HOLDINGS, INC., et al., ¹	:	Case No. 22-10943 (MEW)
	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
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VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019

In connection with the above-captioned chapter 11 cases (the “Chapter 11 Cases”), Kilpatrick Townsend & Stockton LLP (“Kilpatrick Townsend”) hereby submits this verified statement (the “Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule 2019”) with respect to the representation of a group of equity interest holders (the “Ad Hoc Group of Equity Interest Holders” or the “AHG”) of Voyager Digital Ltd. (“VDL”), a debtor and debtor-in-possession in these Chapter 11 Cases.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

1. Attached hereto as **Exhibit A** is a list of the names and addresses² of each member of the Ad Hoc Group of Equity Interest Holders and each member's disclosable economic interests in accordance with Bankruptcy Rule 2019, in the amount set forth in **Exhibit A** (accurate as of September 19, 2022 and reflects the approximate number of VDL shares held by each member as of July 5, 2022). The information contained in **Exhibit A** is based upon information provided by the members of the AHG and is subject to change.

2. On or about September 19, 2022, AHG retained Kilpatrick Townsend and Dundon Advisers, LLC in connection with the above-captioned Chapter 11 Cases. Should additional members join the AHG, Kilpatrick Townsend will file additional Statements as necessary to comply with Bankruptcy Rule 2019.

3. Each member of the AHG has consented to Kilpatrick Townsend's representation of the group. Kilpatrick Townsend does not represent any member of the AHG in its individual capacity.

4. Furthermore, upon information and belief formed after due inquiry, Kilpatrick Townsend has no independent claims against or equity interests in VDL or its affiliated debtor entities.

5. The information contained in this Statement and/or **Exhibit A** attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose, including, without limitation, any restriction or limitation on the rights, abilities, or arguments of the AHG. Nothing in this Statement or **Exhibit A** hereto, should be construed as (i) a limitation upon, or waiver of, any member's right to assert, file, and/or amend claims, if any, in accordance with applicable law and any orders entered in these Chapter 11 Cases, or (ii) an

² To protect the personal information of each member, the address listed for each member is Kilpatrick Townsend's business address (c/o Kilpatrick Townsend & Stockton LLP, Attn: David M. Posner, The Grace Building, 1114 Avenue of the Americas, New York, NY 10036) and the email address for each member is listed as dposner@kilpatricktownsend.com.

admission with respect to any fact or legal theory. Kilpatrick Townsend reserves the right to amend or supplement this Statement on behalf of the AHG.

6. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

Dated: September 19, 2022
New York, NY

AD HOC GROUP OF EQUITY INTEREST HOLDERS
By its Counsel,

KILPATRICK TOWNSEND & STOCKTON LLP

By: /s/ David S. Posner

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-and-

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EXHIBIT A

**Names, Addresses, and Nature of Disclosable Economic
Interests of AHG Members**

NAME³	APPROXIMATE NUMBER OF VDL SHARES⁴	OTHER DISCLOSABLE ECONOMIC INTERESTS
STEPHEN TALLEY	538,809	Certain interests arising from status as a proposed class member in the class action, <i>De Sousa v. Voyager Digital Ltd. et al.</i> , Ontario Superior Court of Justice File No. CV-22-683699-00CP.
RYAN VICE	148,249	Certain interests arising from status as a proposed class member in the class action, <i>De Sousa v. Voyager Digital Ltd. et al.</i> , Ontario Superior Court of Justice File No. CV-22-683699-00CP.
FRANCINE DE SOUSA	13,000	Certain interests arising from status as lead plaintiff in the class action, <i>De Sousa v. Voyager Digital Ltd. et al.</i> , Ontario Superior Court of Justice File No. CV-22-683699-00CP.
DHESAKA JAYASURIYA	1,983	Certain interests arising from status as a proposed class member in the class action, <i>De Sousa v. Voyager Digital Ltd. et al.</i> , Ontario Superior Court of Justice File No. CV-22-683699-00CP.
MICHEL LASSONDE	3,000	Certain interests arising from status as a proposed class member in the class action, <i>De Sousa v. Voyager Digital Ltd. et al.</i> , Ontario Superior Court of Justice File No. CV-22-683699-00CP.

³ The addresses and contact information for all members of the Ad Hoc Group of Equity Interest Holders are provided as c/o Kilpatrick Townsend & Stockton LLP, Attn: David M. Posner, The Grace Building, 1114 Avenue of the Americas, New York, NY 10036 and the email address for each member is listed as dposner@kilpatricktownsend.com.

⁴ To the best of Kilpatrick Townsend's knowledge, the information provided in this column is accurate as of September 19, 2022 and reflects the approximate number of VDL shares held by each member as of July 5, 2022.

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2022, I caused a true and exact copy of the foregoing
VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019 to be filed
electronically with the Clerk of the Court using the CM/ECF system which in turn will send
notification of such filing to all interested parties of record.

/s/ David M. Posner

David M. Posner